

CERTIFICATE OF SERVICE

DEBTOR 1 NAME: ALAA EID YOUSEF
DEBTOR 2 NAME:

CASE NUMBER: 1732597

I Robert J Wallace, Jr. certify under penalty of perjury that I have served the attached document on the below listed entities in the manner shown on 6/30/2017 :

By First Class Mail :

ACCEPTANCE NOW,ACCEPTANCE NOW CUSTOMER SERVICE,501 HEADQUARTERS DR,PLANO TX 75024
ALAA EID YOUSEF,6410 BOW TRAIL ST.,HOUSTON TX 77084
ALLY FINANCIAL,PO BOX 380901,BLOOMINGTON MN 55438
ARS/ACCOUNT RESOLUTION SPECIALIST,PO BOX 459079,SUNRISE FL 33345
ASSET ACCEPTANCE,ATTN: BANKRUPTCY DEPT,PO BOX 2036,WARREN MI 48090
BMW BANK OF NORTH AMER,2735 E PARLEYS WAY,SALT LAKE CITY UT 84109
BUCKLEY MADOLE, P.C.,14841 DALLAS PARKWAY, SUITE 300,DALLAS TX 75254
CHASE CARD SERVICES,CORRESPONDENCE DEPT,PO BOX 15278,WILMINGTON DE 19850
COMMONWEALTH FINANCIAL SYSTEMS,245 MAIN ST,DICKSON CITY PA 18519
CONVERGENT OUTSOURCING, INC,PO BOX 9004,RENTON WA 98057
CREDENCE RESOURCE MANAGEMENT,PO BOX 2300,SOUTHGATE MI 48195
CREDIT COLLECTIONS SVC,PO BOX 773,NEEDHAM MA 02494
CYPRESS FAIRBANKS ISD,P.O. BOX 692003,HOUSTON TX 77269-2003
ELOISE A GUZMAN,GUZMAN LAW FIRM,8225 GULF FREEWAY,HOUSTON TX 77017
ERC/ENHANCED RECOVERY CORP,8014 BAYBERRY RD,JACKSONVILLE FL 32256
GUZMAN LAW FIRM,8225 GULF FREEWAY,HOUSTON TX 77017
HARRIS COUNTY M.U.D. #16,11111 KATY FREEWAY #725,HOUSTON TX 77079-2197
HARRIS COUNTY TAX OFFICE,P. O. BOX 4622,HOUSTON, TEXAS 77210-4622,HOUSTON 77210-4622
HEBA YOUSEF,6410 BOW TRAIL ST.,HOUSTON TX 77084
JVSGROUP,4288 NUTMET RD,GILMER TX 75644
LINEBARGER, GOGGAN, BLAIR & SAMPSON, LLP,P.O. BOX 3064,HOUSTON TX 77253-3064
NISSAN MOTOR ACCEPTANCE CORP/INFINITY LT,NMAC/ATTN: BANKRUPTCY,PO BOX 660360,DALLAS TX 75266
NORTHLAW,1010 LAMAR ST., STE. 1500,HOUSTON TX 77002
OFFICE OF THE ATTY GENERAL/CHILD SUPPORT,ATTN: BANKRUPTCY,PO BOX 12017,AUSTIN TX 78711
STEVE FREEMAN,300 SHEPHERD DR.,HOUSTON TX 77007
STONE CREEK,C/O STERLING ASSOCIATION SERVICES, INC.,6842 N. SAM HOUSTON PARKWAY WEST,HOUSTON TX 77064
TNB-VISA (TV) / TARGET,C/O FINANCIAL & RETAIL SERVICES,MAILSTOP BV PO BOX 9475,MINNEAPOLIS MN 55440
UNITED STATES BANKRUPTCY COURT,PO BOX 61010,HOUSTON TX 77208
US TRUSTEE,OFFICE OF THE US TRUSTEE,515 RUSK AVE,STE 3516 HOUSTON TX 77002
WELLS FARGO HOME MORTGAGE,WRITTEN CORRESPONDENCE RESOLUTIONS,MAC#2302-04E- POB 10335,DES MOINES IA 50306
WESTLAKE FINANCIAL SRVS,CUSTOMER CARE,PO BOX 76809,LOS ANGELES CA 90054
WILLIAM E. HEITKAMP,OFFICE OF CHAPTER 13 TRUSTEE,9821 KATY FREEWAY,STE 590 HOUSTON TX 77024

Via ECF on the date the pleading was filed:
Debtor's Attorney

I certify that I have prepared the Certificate of Service and that it is a true and correct copy to the best of my knowledge, information and belief.

Date : 6/30/2017

Signature : Robert J. Wallace, Jr.

Premium Graphics, Inc.
2099 Thomas Road Suite 10
Memphis, TN 38134

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In Re: Alaa Eid Yousef
Debtor(s)

Case No: 17-32597-H5-13

**TRUSTEE'S OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN
AND
MOTION TO DISMISS**

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING. If a response is filed, a hearing on this motion will be held at 9:30 am on Tuesday, July 25, 2017 at the U.S. Courthouse, 515 Rusk, Courtroom # 403.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

COMES NOW, William E. Heitkamp, Trustee, filing this Chapter 13 Trustee's Objection to Confirmation of Chapter 13 Plan and Motion to Dismiss pursuant to Fed. R. Bankr. P. 1017 and Local Bankruptcy Rule 1017-2. The Chapter 13 Trustee objects to confirmation of the plan, and would show the Court that the plan does not meet the requirements for confirmation and thus constitutes grounds for dismissal for the following reasons:

1. The Debtor has not provided the Trustee with information sufficient for the Trustee to comply with 11 U.S.C. Section 1302(d) for the Domestic Support Obligation.
2. The Chapter 13 Plan must be amended to provide for payment in full of the secured and priority claims within the term of the plan.
3. Payments due Pursuant to 11 U. S. C. 1326 (A) (1), and 1325 (A) (2) have not been made. All payments to the Chapter 13 Trustee must be sent to the following address: P.O. Box 740 Memphis, TN 38101-0740.
4. The debtors have not filed their federal income tax return for the following years: 2015 & 2016. Therefore the debtors are not able to meet the burden of proving that the plan complies with 11 U.S.C. Sec. 1322 (A) (2).
5. The Debtor has failed to implement a wage deduction order or EFT/ACH authorization as required by Local Bankruptcy Rule 1007-1(c).
6. The debtor has failed to provide proof of income to substantiate the income amounts listed on Schedule I and Form 22C.

WHEREFORE, Trustee prays that the Court deny confirmation of the plan and dismiss the case.

RESPECTFULLY SUBMITTED,

/s/ William E. Heitkamp

WILLIAM E. HEITKAMP, TRUSTEE

ADMISSIONS ID NO. 3857

ADDRESS FOR CORRESPONDENCE ONLY:

9821 KATY FREEWAY, SUITE 590

HOUSTON, TX 77024

(713) 722-1200 TELEPHONE

(713) 722-1211 FACSIMILE

ADDRESS FOR PAYMENTS ONLY:

P.O. BOX 740

MEMPHIS, TN 38101-0740